

NVB 7026 (Rev. 6/16)

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**UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEVADA**

\* \* \* \* \*

**In re** CHARLES RANDALL LAZER

**BK:** 22-11549-mkn

**Chapter:** 7

**Adv. No.:** 22-01125-mkn

**Debtor(s).**

**STANDARD DISCOVERY PLAN  
 OR**

**REQUEST FOR WAIVER OF  
 FILING DISCOVERY PLAN**

Daphne Williams

**Plaintiff(s),**

**vs.**

CHARLES RANDALL LAZER

**Defendant(s)**

**1. Discovery Plan**

**Request for waiver of requirement to prepare and file a formal discovery plan.**

The parties certify that all discovery can be completed informally, without the need of court intervention and in conformance of the Standard Discovery Plan, and that the matter will be ready for trial within 120 days, or

☒ **A discovery plan is needed or useful in this case.** Check one:

☒ The parties agree to the standard discovery plan. The first defendant answered or otherwise appeared on August 30, 2022. Discovery shall be completed within 120 days, measured from the date the first defendant answered or otherwise appeared. Discovery will close by December 28, 2022.

1           \_\_\_\_\_ The parties jointly propose to the court the attached discovery plan and  
2 scheduling order. (Use Official Form 35 to the Federal Rules of Civil Procedure.)

3           \_\_\_\_\_ The parties cannot agree on a discovery plan and scheduling order. The  
4 attached sets forth the parties' disagreements and reasons for each party's position. (Use Official  
5 Form 35 of the Federal Rules of Civil Procedure.)

6 **Complete parts 2 - 6.**

7 **2. Nature of the Case.** Brief description of the nature of the case, i.e., dischargeability,  
8 denial of discharge, turnover, contract, etc. a non-dischargeability action pursuant to §523(a)  
9 \_\_\_\_\_

10 **3. Jury Trials:** Check one:

11 ☒ A demand for a jury trial has not been made

12 \_\_\_\_\_ A demand for a jury trial has been made pursuant to Fed. R. Civ. P. 38(b), and in  
13 conformity with LR 9015, but one or more of the parties does not consent to a jury trial pursuant  
14 to 28 U.S.C. § 157(e).

15 \_\_\_\_\_ It is expressly understood by the undersigned parties they have demanded a jury  
16 trial pursuant to Fed. R. Civ. P. 38(b), and in conformity with LR 9015, and have consented to a  
17 jury trial pursuant to 28 U.S.C. § 157(e).

18 An original and two (2) copies of all instructions requested by either party shall be  
19 submitted to the clerk for filing on or before February 15, 2022.

20 An original and two (2) copies of all suggested questions of the parties to be asked of the  
21 jury panel by the court on voir dire shall be submitted to the clerk for filing on or before  
22 February 22, 2022.

23 **4. Additional Pleadings.** Are there any counterclaims, cross claims or amendments to the  
24 pleadings expected to be filed?

25 \_\_\_\_\_ Yes

26 ☒ No

1 **5. Settlement Conference**

2 \_\_\_\_\_ A settlement conference is requested.

3 If checked, a settlement conference is requested no earlier than \_\_\_\_\_.

4 ☒ Settlement cannot be evaluated prior to additional discovery. The parties  
5 may later request a settlement conference.

6 **6. Trial**

7 The case should be ready for trial by March 1, 2022 and should take  
8 1 day(s).

9 7. All parties ☒ consent/ ☐ do not consent to this court entering final judgment.

10  
11 Dated: 10/18/2022

Dated: 10/18/2022

12 /s/ Trey A. Rothell

/s/ Christopher P. Burke

13 Signature of Counsel for Plaintiff(s)

Signature of Counsel for Defendant(s)

14 Type Name, Address and  
15 Telephone Number of Counsel

Type Name, Address and Telephone  
Number of Counsel

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22 Attorneys for Creditor/ Plaintiff  
23 Daphne Williams

Attorneys for Debtor/ Defendant  
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